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July 2, 2024

The Hon. Andrew E. Krause  
United States Magistrate Judge  
United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601

Re: *United States v. Jayleen Mota*, Case No. 23-mj-3028

Dear Judge Krause,

I am writing to request that the Court permit Pretrial Services to release Ms. Mota's passport to her so that she can travel to the Dominican Republic on her already-approved family trip.

By way of background, Ms. Mota was arrested on April 17, 2023, on one count of transmitting threats in interstate commerce, in violation of 18 U.S.C. § 875(c). That same day, the Court released Ms. Mota on an agreed-upon bail package. Ms. Mota complied with all pretrial conditions. On February 27, 2024, Ms. Mota and the government entered into a deferred prosecution agreement. The same conditions of release continued.

On June 28, this Court, the Honorable Judith C. McCarthy presiding, endorsed an unopposed request for Ms. Mota to travel to the Dominican Republic for her younger sister's birthday celebration. Doc. No. 25. The two-week trip is supposed to commence on or about July 6, 2024.

Yesterday, Pretrial Services Officer Laura Gialanella graciously reminded the undersigned that Ms. Mota's passport is still in Pretrial's possession. Thus, with this letter, Ms. Mota requests that her passport be released into her possession today (or as soon as possible) so that Ms. Mota may travel to the Dominican Republic as planned. Per Officer Gialanella's suggestion, Ms. Mota is required to return her passport to Pretrial Services within 48 hours of her return to the United States.

I have discussed this request with AUSA Timothy Ly. He has no objection. Thank you for your consideration of this request.

Sincerely,



Rachel Martin  
Assistant Federal Defender

cc: AUSA Timothy Ly  
U.S. Pretrial Services Officer Laura Gialanella